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August 15, 2024

MEMO ENDORSED

VIA ECF

The Honorable Laura Taylor Swain
Chief United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Gregoire Tournant*, 22-cr-276 (LTS)

Dear Chief Judge Swain:

The parties submit this joint letter regarding (1) Mr. Tournant's deadline to object to the first disclosure of his presentence report ("PSR") and (2) Mr. Tournant's sentencing date, which is currently scheduled for October 16, 2024.

With respect to the PSR, the parties received the first disclosure of Mr. Tournant's PSR on August 2. Pursuant to Federal Rule of Criminal Procedure 32, Mr. Tournant has fourteen days to serve his objections on Probation and the Government (*i.e.*, until August 16). *See* Fed. R. Crim. P. 32(f)(1). Given the complex nature of this case and the length of the PSR, Mr. Tournant respectfully requests an extension of Mr. Tournant's deadline for objecting to the first disclosure of his PSR from August 16 to September 4. The Government and Probation have no objection to Mr. Tournant's request.

In light of the anticipated September 30 deadline for the second disclosure of the PSR and the complexity of the sentencing submissions, the Government and Mr. Tournant respectfully request that the Court adjourn the sentencing date from October 16 to a date in mid-November that is convenient for the Court. Assuming the Court is willing to grant the parties' request, once a new sentencing date is set, the parties will propose a schedule for the filing of the parties' sentencing submissions that gives the Court sufficient time to review the parties' papers prior to sentencing.

We thank the Court for its consideration.

Respectfully submitted,

LEVINE LEE LLP

/s/ Seth L. Levine

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Attorneys for Defendant Gregoire Tournant

cc: Daniel R. Alonso, Esq.
All counsel of record (via ECF)

The foregoing requests are granted. The deadline for Mr. Tournant to object to the first disclosure of his PSR is extended to September 4, 2024. Mr. Tournant's sentencing hearing, currently scheduled for October 16, 2024, at 11:00 AM, is adjourned to **November 15, 2024, at 12:00 PM**, in Courtroom 17C.

SO ORDERED.

August 16, 2024

/s/ Laura Taylor Swain, Chief USDJ